

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE: TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

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) **Civil Action No. 03. MDL 1570 (GBD)**
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**DEFENDANT MUSLIM WORLD LEAGUE’S RULE 26(a)(1) AMENDED INITIAL
DISCLOSURES**

Defendant Muslim World League (“MWL”), by and through its undersigned counsel, makes the following Amended Initial Disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1). These Amended Initial Disclosures are based on information reasonably available to MWL as of the date hereof. The disclosures herein are provided without prejudice to the rights of MWL to identify additional witnesses or evidence. Further, MWL reserves the right to supplement these disclosures.

I. Individuals With Relevant Discoverable Information

The following individuals are likely to have discoverable information that MWL may use to support its defenses. MWL does not consent to any communications with its employees, agents, officers, or directors, whether formerly or presently associated or employed by MWL and does not consent to any other communication prohibited by any applicable rule of professional conduct.

1. Dr. Abdullah Naseef

Former Secretary General – MWL Head Office, Makkah, Saudi Arabia

Address: Saudi Arabia

Contact: Can be reached through his counsel

Subject Matter: Among other things, Dr. Naseef may have information relating to MWL’s policies, procedures and operations; MWL’s relationship to or affiliation with other entities; and MWL’s defenses.

2. **Dr. Ahmed Muhammed Ali**

Former Secretary General – MWL Head Office, Makkah, Saudi Arabia

Address: Saudi Arabia

Contact: Can be reached through counsel

Subject Matter: Among other things, Dr. Ali may have information relating to MWL's policies, procedures and operations; MWL's relationship to or affiliation with other entities; and MWL's defenses.

3. **Dr. Abdullah bin Saleh Al-Obaid**

Former Secretary General – MWL Head Office, Makkah, Saudi Arabia

Address: Saudi Arabia

Contact: Can be reached through his counsel

Subject Matter: Among other things, Dr. Al-Obaid may have information relating to MWL's policies, procedures and operations; MWL's relationship to or affiliation with other entities; and MWL's defenses.

4. **Dr. Abdullah bin Abdulmohsin Al-Turki**

Former Secretary General – MWL Head Office, Makkah, Saudi Arabia

Address: MWL Head Office, Makkah, Saudi Arabia

Contact: Can be reached through his counsel

Subject Matter: Among other things, Dr. Al-Turki may have information relating to MWL's policies, procedures and operations; MWL's relationship to or affiliation with other entities; and MWL's defenses.

5. **Dr. Saad bin Humaid Al-Subaie**

Former Deputy Secretary General for Financial and Administrative Affairs – MWL Head Office, Makkah, Saudi Arabia

Address: MWL Head Office, Makkah, Saudi Arabia

Contact: Can be reached through counsel

Subject Matter: Among other things, Dr. Al-Subaie may have information relating to MWL's policies, procedures and operations; MWL's relationship to or affiliation with other entities; and MWL's defenses.

6. **Mr. Mohamed Al-Hasani,**

Former Director of Overseas Offices and Centers – MWL Head Office, Makkah, Saudi Arabia

Address: MWL Head Office, Makkah, Saudi Arabia

Contact: Can be reached through counsel

Subject Matter: Among other things, Mr. Al-Hasani may have information relating to MWL's oversight over offices and centers abroad; and MWL's defenses.

7. **Mr. Muhammad Fawzi Abdullah**
Accountant – MWL Head Office, Makkah, Saudi Arabia
Address: MWL Head Office, Makkah, Saudi Arabia
Contact: Can be reached through counsel
Subject Matter: MWL custodian of documents
8. **Mr. Musa Al-Mogamse**
Director of Financial Affairs and Services – MWL Head Office, Makkah, Saudi Arabia
Address: MWL Head Office, Makkah, Saudi Arabia
Contact: Can be reached through counsel
Subject Matter: Mr. Al-Mogamse may have information relating to MWL's financial controls.
9. **Mr. Rahmatullah Enayatullah Ahmed**
Director General of Studies and Conferences and Director of the Secretary General's Office – MWL Head Office, Makkah, Saudi Arabia
Address: MWL Head Office, Makkah, Saudi Arabia
Contact: Can be reached through counsel
Subject Matter: Mr. Ahmed may have information relating to MWL operations, studies and conferences.
10. **Mr. Ali Al-Thaqafi**
Director of General Oversight – MWL Head Office, Makkah, Saudi Arabia
Address: MWL Head Office, Makkah, Saudi Arabia
Contact: Can be reached through counsel
Subject Matter: Mr. Al-Thaqafi may have information relating to MWL's personnel management.
11. **Mr. Ahmad Qurban**
Former Director of the Administrative Communications Department – MWL Head Office, Makkah, Saudi Arabia
Address: MWL Head Office, Makkah, Saudi Arabia
Contact: Can be reached through counsel
Subject Matter: Mr. Qurban may have information relating to the maintenance of MWL's files and records.
12. **Mr. Jameel Qutub**
Computer Center Director – MWL Head Office, Makkah, Saudi Arabia
Address: MWL Head Office, Makkah, Saudi Arabia
Contact: Can be reached through counsel
Subject Matter: Mr. Qutub may have information relating to MWL's computer capabilities and electronically stored information.

13. Mr. Mahmud Said

External Auditor – M. Said & Co Chartered Certified Accountants

Address: 137 Blackstock Rd, London N4 2JW, United Kingdom

Contact: Can be reached through counsel

Subject Matter: Mr. Said may have information relating to MWL audits.

14. Mr. Mohamed El Ayouti

External Auditor – El Sayid El Ayouti & Co., Certified Public Accountants

Address: Building No. 58, Al-Watan Al Arabi St. Al-Hamra'a District/ 1
N14 W8 P.O. Box 780, Jeddah 21421, Saudi Arabia

Contact: Can be reached through counsel

Subject Matter: Mr. El Ayouti may have information relating to MWL audits.

15. Mr. Ahmed Makdom

Director – MWL Branch Office, London, United Kingdom

Address: MWL Branch Office, London, United Kingdom

Contact: Can be reached through counsel

Subject Matter: Mr. Makdom may have information relating to MWL branch office operations and relationship with MWL Head Office; and MWL London operations.

16. Mr. Hashim Mahdi

Former Director – MWL Branch Office, Paris, France

Address: MWL Branch Office, Paris, France

Contact: Can be reached through counsel

Subject Matter: Mr. Mahdi may have information relating to MWL branch office operations and relationship with MWL Head Office; and MWL relationship with foreign governments.

17. Dr. Saud bin Abdullah El-Gudaian

Director – Islamic Cultural Center Madrid, Spain

Address: Islamic Cultural Center in Madrid, Spain

Contact: Can be reached through counsel

Subject Matter: Mr. El-Gudaian may have information relating to MWL Spain operations and the Islamic Cultural Center operations.

18. Mr. Adil Gaisar Ali Mustafa

Administrative Assistant – Islamic Cultural Center Madrid, Spain

Address: Islamic Cultural Center in Madrid, Spain

Contact: Can be reached through counsel

Subject Matter: Mr. Mustafa may have information relating to MWL Spain operations and the Islamic Cultural Center operations.

19. Mr. Antonio Garcia Petite

External Auditor – Islamic Cultural Center Madrid, Spain

Address: Islamic Cultural Center in Madrid, Spain

Contact: Can be reached through counsel

Subject Matter: Mr. Petite may have information relating to MWL Spain financials and its affiliation with the Spanish Government.

20. Mr. Fahad bin Sanad Al-Harbi

Director – MWL Branch Office, Indonesia

Address: MWL Branch Office, Jakarta, Indonesia

Contact: Can be reached through counsel

Subject Matter: Mr. Al-Harbi may have information relating to MWL Indonesia operations.

21. Mr. Abdelhadi Daguit

Former Director and Social Welfare Manager – MWL Branch Office, Philippines

Address: Manila, Philippines

Contact: Can be reached through counsel

Subject Matter: Mr. Daguit may have information relating to MWL Philippines operations.

22. Mr. Sami Al-Harbi

Director of Organizations and Conferences – MWL Head Office, Makkah, Saudi Arabia

Address: MWL Branch Office, Kenya

Contact: Can be reached through counsel

Subject Matter: Mr. Al-Harbi may have information relating to MWL Kenya operations

23. Mr. Rahmatullah Nazir Khan Gari

Former Regional Director – MWL Regional Office-Bosnia & Herzegovina

Address: Saudi Arabia

Contact: Can be reached through counsel

Subject Matter: Mr. Gari may have information relating to MWL Pakistan operations and IIRO Bangladesh operations.

24. Mr. Abdu Atain

Director – MWL Branch Office, Pakistan

Address: MWL Branch Office, Islamabad, Pakistan

Contact: Can be reached through counsel

Subject Matter: Mr. Atain may have information relating to MWL Pakistan operations.

25. Mr. Muhammad Javid Butt

Accountant – MWL Branch Office, Pakistan

Address: MWL Branch Office, Islamabad, Pakistan

Contact: Can be reached through counsel

Subject Matter: Mr. Butt may have information relating to MWL Pakistan operations.

26. Mr. Moayid Al-Butayri

Former Director, MWL Branch Office, Pakistan

Address: Khobar, Saudi Arabia

Contact: Can be reached through counsel

Subject Matter: Mr. Al-Butayri may have information relating to MWL Pakistan operations.

27. Mr. Qari Nooruzaman Shurafat

Quran Program Supervisor – IIRO Branch Office, Afghanistan

Address: IIRO Branch Office, Kabul, Afghanistan

Contact: Can be reached through counsel

Subject Matter: Mr. Shurafat may have information relating to MWL Peshawar, Pakistan and Afghanistan operations.

28. Any witness on Plaintiffs' or Defendants' witness lists.

II. Categories of Relevant Documents

MWL has already produced copies of documents, in its possession, custody, or control that it may use to support its defenses. *See* MWL 00001 – MWL 0118653.

MWL's disclosures are made subject to and without waiving the right to object on the grounds of competency, privilege, relevancy and materiality, hearsay, or any other proper ground to the use of any such information, for any purpose, in whole or in part, in any subsequent proceeding in this action or any other action.

III. Computation of Damages

MWL has not asserted a claim for damages against any other party in this action.

IV. Insurance

MWL is unaware of any insurance agreement under which an insurance business may be liable to satisfy all or part of a judgment that may be entered in this action, or to indemnify or reimburse payments made to satisfy such a judgment.

March 9, 2018

Respectfully submitted,

/s/ Aisha E. Bembry

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